

EXHIBIT 6

Page 1

1

2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 -----x

5 RUBY FREEMAN and WANDREA MOSS,

6 Plaintiffs,

7 Case No.

8 v. 24-cv-6563 (LJL)

9 RUDOLPH W. GIULIANI,

10 Defendant.

11 -----x

12 9:11 a.m.

13 December 31, 2024

14

15 VIRTUAL DEPOSITION of RYAN MEDRANO, a
16 Witness in the above entitled matter, taken
17 pursuant to Subpoena, before Stephen J. Moore, a
18 Registered Professional Reporter, Certified
19 Realtime Reporter and Notary Public of the State
20 of New York.

21

22

23

24

25

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1	RYAN MEDRANO	1	RYAN MEDRANO	
2	A P P E A R A N C E S :	2	Exhibit 8 E-mail from Mr. Medrano to	
3		3	148 15 Mr. Ricci dated December 19,	
4	WILLKIE FARR & GALLAGHER LLP	4	2023	
5	Attorneys for Plaintiffs	5		
6	1875 K Street NW	6	Exhibit 9 Series of e-mail between Mr.	
7	Washington, DC 20006	7	165 9 Medrano and Mr. Ricci dated	
8		8	December 19, 2023	
9	BY: AARON NATHAN, ESQ.	9		
10	- and -	10	Exhibit 10 E-mail	
11	MAGGIE MacCURDY, ESQ.	11		
12	- and -	12	Exhibit 11 E-mail from Heath Berger	
13	MERYL GOVERNNSKI, ESQ.	13	210 24 dated January 25, 2024, it's to	
14	- and -	14	Mr. Giuliani, et al.	
15	AMELIA DIAZ, ESQ.	15		
16		16	Exhibit 12 E-mail from Ryan Medrano to	
17		17	213 12 Joe Ricci with attachment	
18		18		
19		19	Exhibit 13 E-mail	
20		20	217 8	
21		21	Exhibit 14 E-mail from Maria Ryan	
22		22	219 19	
23		23	Exhibit 15 E-mail from Maria Ryan with	
24		24	226 17 attachment	
25		25		
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1	RYAN MEDRANO	1	RYAN MEDRANO	
2	EXAMINATION BY	PAGE	2	Exhibit 16 Series of e-mail from Ryan
3	MR. NATHAN	9 14	3	230 11 Medrano to Joe Ricci
4			4	
5	E X H I B I T S		5	Exhibit 17 E-mail from Joe Ricci to
6			6	232 19 Ryan Medrano
7	Exhibit 1 E-mail	123 13	7	
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14	Joe Ricci to		14	Exhibit 20 Calendar invitation from
15	Ryanmedrano@Giulianipartners.co		15	250 23 Gary Rosen
16	m with attachment		16	
17			17	Exhibit 21 e-mail from Joe Ricci to
18	Exhibit 5 E-mail dated December 7, 2023	136 3	18	254 14 Ryan Medrano with attached
19	from Joe Ricci to Rudy Giuliani		19	19 invoice
20	and Maria Ryan		20	
21			21	Exhibit 22 E-mail with attachment
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24	Exhibit 7 E-mail exchange between Mr.	145 9	24	265 5
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<p>1 RYAN MEDRANO</p> <p>2 A Financial related accounting, 3 bookkeeping, I like to say, and I worked 4 with a guy named Joe Ricci, who is our 5 accountant.</p> <p>6 Q Okay. How is Giuliani or how 7 is Giuliani Partners organized?</p> <p>8 A In the early days there were 9 several partners, but then they all started 10 departing, I assume around 2010, 2012.</p> <p>11 And now, the last couple of 12 years, while it was still open, Rudy was the 13 only person that -- and you can talk to Joe 14 about this, but he was the only person who 15 had capital in the company.</p> <p>16 Because he kept on loaning 17 the company money, and he actually has a 18 company that is in debt to him actually 19 several million dollars.</p> <p>20 Q Is Giuliani Partners an LLC?</p> <p>21 A Yes.</p> <p>22 Q Do you know who the members 23 of the LLC are?</p> <p>24 A Technically they are still 25 there, but they are all passive partners,</p>	<p>Page 26</p> <p>1 RYAN MEDRANO</p> <p>2 one this year.</p> <p>3 Q This year, meaning tax year 4 2024?</p> <p>5 A '24, yes.</p> <p>6 Q Just with respect to Giuliani 7 Partners, how many people are paid by 8 Giuliani Partners?</p> <p>9 A None. It's closed, 10 basically.</p> <p>11 Q When was the last time that 12 Giuliani Partners paid any individuals or 13 entities?</p> <p>14 A I'm not exact dates, but I 15 would say '21, maybe; 2021.</p> <p>16 Q Okay. Do you recall who 17 those individuals or entities were?</p> <p>18 A I don't. I would have to 19 look in the records, but I am one of the few 20 people that are on that.</p> <p>21 I'm trying to think what 22 other companies. The security detail was 23 Giuliani Security. They all left in '21, 24 '22.</p> <p>25 Who else was around? I would</p>
<p>1 RYAN MEDRANO</p> <p>2 because they haven't participated in it, a 3 lot of them, for over a decade, so it's 4 really only Rudy right now.</p> <p>5 Q Do you know who the other 6 members are?</p> <p>7 A Yeah, yes.</p> <p>8 Q And who are they?</p> <p>9 A Okay, hold on, let me make 10 sure I get them all.</p> <p>11 I think this is it. There is 12 Jeff Hess, Mike Hess, Eric Hatsamamos, Dan 13 Connolly, Anthony Carbonetti, Steve Osterly 14 -- Jeff Hess, Michael Hess, Eric Hatsamamos, 15 Dan Connolly, Anthony Carbonetti, Stephen 16 Osterly and Dennis Young, who passed away I 17 think two or three years ago.</p> <p>18 But again, most of these guys 19 left after the failed presidential bid and 20 they have really not had much to do with the 21 company, just having their name on it until 22 it's dissolved, so.</p> <p>23 Q Does Giuliani Partners file 24 regular tax returns?</p> <p>25 A Yes, this should be the final</p>	<p>Page 27</p> <p>1 RYAN MEDRANO</p> <p>2 have to look, I don't know.</p> <p>3 Q When you say the security 4 detail, who are you referring to?</p> <p>5 A He had a security detail that 6 he paid for once he left office, so they 7 were a bunch of ex-police, ex-NYPD that took 8 care of him, and they slowly started falling 9 off as they couldn't afford them.</p> <p>10 Q Does Dr. Ryan receive any 11 payment from Giuliani Partners?</p> <p>12 A I have to check, I don't 13 remember when she came on. Currently, from 14 Standard U.S.A., she gets a salary for being 15 the CEO or operating manager of it.</p> <p>16 Q Okay. Does -- do you know 17 who Monsignor Alan Placa is?</p> <p>18 A Yes, he's an old friend of 19 Giuliani's.</p> <p>20 Q Does he receive any payment 21 from Giuliani Partners?</p> <p>22 A No. He's owed money, but I 23 highly doubt he will collect that.</p> <p>24 Q Why is he owed money?</p> <p>25 A Because he was working for</p>

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<p>1 RYAN MEDRANO 2 free for a year during COVID, I believe. I 3 will have to look at the records. 4 Q What was Monsignor Placa's 5 role at Giuliani Partners? 6 A He was more technology, IT. 7 Q What do you mean by 8 technology and IT? 9 A He dealt with the computers, 10 the phone system, computer system, 11 technology. 12 Q Okay. Did he have a title? 13 A I don't recall. 14 Q Is that the only role that he 15 has had with Mr. Giuliani's companies? 16 A The money -- I didn't really 17 get involved with what each person did. At 18 one point there were probably over 200 19 people that worked there when Giuliani 20 Capital Advisors, back in the day, 2005, 21 2006. 22 Q When you say Monsignor Placa 23 worked for free, what were the circumstances 24 of that arrangement? 25 A I think we were supposed --</p>	<p>Page 30</p> <p>1 RYAN MEDRANO 2 Giuliani Partners made any profit 3 distributions? 4 A I would have to look, I don't 5 know. I mean, you are asking something 6 that's really -- 7 Q If Giuliani Partners were to 8 make a profit distribution, who would be 9 entitled to -- 10 A Just Giuliani at this point, 11 my understanding is it's Giuliani. 12 Q What's that understanding 13 based on? 14 A He's the only one that has 15 money invested in the firm, and he was 16 basically paying to keep the payroll open 17 for a couple of years in late 2010, 2015, 18 '16. 19 Q To the extent that you don't 20 recall the details of the arrangements with 21 Giuliani Partners, what types of -- what 22 would you have to look at to refresh your 23 recollection? 24 A The tax returns. 25 Q Are there any --</p>
<p>1 RYAN MEDRANO 2 again, I'm not sure, but I think we were 3 supposed to pay him a retainer, and he may 4 have worked for a year, still helped us, but 5 he's not going to get paid, because there is 6 no money there. 7 Q Was there a written agreement 8 with Monsignor Placa? 9 A I believe so in the record 10 file from years ago. There has to be 11 something in his file. 12 Q I think you said that he 13 wasn't going to collect the money he's owed. 14 Why do you believe that? 15 A Because the company is zero, 16 it's broke. Who's going to pay him? 17 Q Does Giuliani Partners ever 18 make distributions of any profits? 19 A They did back in the day, but 20 it hasn't been profitable for a good six or 21 seven years, so. 22 Q How long ago is back in the 23 day? 24 A 2001 to 2010 or '11. 25 Q Since around 1010 or '11 has</p>	<p>Page 31</p> <p>1 RYAN MEDRANO 2 A Joe, Joe would have them. 3 Q Do you possess any of the 4 documents detailing the arrangements at 5 Giuliani Partners? 6 A Meaning? What do you mean? 7 Q Do you possess any of 8 Giuliani Partners' tax returns? 9 A Yes, I have some of them, but 10 Joe -- 11 Q Do you have a copy of its 12 operating agreement or membership agreement? 13 A From 2001. And then I 14 believe after Roy Bailey left I have an 15 amendment. 16 Q Okay. 17 Did you or do you have an 18 e-mail at Giuliani Partners? 19 A I do; but I don't really 20 check it that often anymore, so -- 21 Q How many people -- do you 22 know whether anybody else has a Giuliani 23 Partners e-mail? 24 A Probably five or six, I don't 25 know, I have to call the tech people and ask</p>

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<p>1 RYAN MEDRANO 2 them who's still on that thing. 3 Q If Giuliani Partners is not 4 active, why does it still have active e-mail 5 addresses? 6 A Just not focusing on it, and 7 this year we decided let's just close 8 everything, it's time. 9 I have asked to close to a 10 couple of years ago, but it's just something 11 that you have to get to, and it costs money 12 to do, and a lot of things, but it's -- to 13 get them, to convince them to close them. 14 Q When you say we decided let's 15 just close everything, it's time, who do you 16 mean by we? 17 A I talked to Rudy about that 18 at the beginning of the year. 19 Q At the beginning of what 20 year? 21 A 2024. 22 And Joe Ricci, our 23 accountant. 24 Q Have you taken any steps to 25 close Giuliani Partners?</p>	<p>Page 34</p> <p>1 RYAN MEDRANO 2 don't know how it's done. I don't know -- 3 I'm not a lawyer, or -- 4 Q Okay, I would like to ask 5 about Giuliani Group that you mentioned. 6 What is Giuliani Group? 7 A It was a pass-through entity, 8 one of the -- from what I can recall, it was 9 one of the -- it was created because Ernst & 10 Young was a partner when the firm started. 11 And to avoid conflict of 12 interest, because they audited a lot of 13 companies, they created Giuliani Group. 14 So it existed for a year or 15 two, and then after that it's been dormant, 16 it's a pass-through. 17 Q You say Ernst & Young was a 18 partner when the firm started. Which firm 19 are you referring to? 20 A All of them, I think Giuliani 21 & Company, though, which is the umbrella 22 company of all of them. 23 Q Okay. 24 A Or maybe -- no, I'm sorry. I 25 think they were a partner of -- I don't</p>
<p>1 RYAN MEDRANO 2 A Yes, well, Joe has been doing 3 it, for sure. 4 Q Okay. When you say it costs 5 money, where is that money going to come 6 from? 7 A I don't know. We have been 8 trying to use people we know, but I don't 9 know the details. 10 I would ask Joe Ricci what it 11 cost, because he's the one who says it's 12 going to cost a lot of money to do it, but I 13 haven't been handed a bill. 14 Q When you say we have been 15 trying to use people we know, what do you 16 mean by that? 17 A Really like Joe, he's been 18 helping, the accountant. I don't know if 19 he's reaching out to any lawyers, friends of 20 his, I have no idea, but in essence it's 21 closing the accounts out. 22 Q So when you say it's going to 23 cost money to close Giuliani Partners, what 24 costs exactly are you referring to? 25 A I think legal fees. I just</p>	<p>Page 35</p> <p>1 RYAN MEDRANO 2 know. I would have to look at the records 3 again. 4 Q So, what's your -- is 5 Giuliani Group also an LLC? 6 A Yes, I believe they are all 7 LLCs, except for World Capital, which is an 8 S Corp. 9 Q And what's your understanding 10 of what a pass-through entity is? 11 A Pass-through entity on the 12 tax return doesn't file one, and the money 13 goes up to the Giuliani Company, which is 14 the ultimate -- I don't know what you call 15 it, top, the top company, holding company, I 16 guess. 17 I don't really know what the 18 technical term is. 19 Q Okay. 20 Maybe I should just get a 21 full picture of the map of these companies, 22 so that I can know which to ask for in which 23 order, which to ask about in which order. 24 You mentioned that Giuliani & 25 Company is the umbrella company?</p>

10 (Pages 34 - 37)

<p>1 RYAN MEDRANO 2 worked for him. 3 Q Is there any reason he 4 wouldn't have been able to pay the people 5 who worked for him directly? 6 A I don't believe he could -- 7 well, I would have to talk to the 8 accountants on that one, but they are the 9 ones who decided this is the proper way to 10 go. 11 Q Are you an accountant? 12 A No, I am not. 13 Q Okay, I think you've called 14 yourself the money man a few times. 15 A It's finance related, so 16 that's why I was talking about, and 17 accounting. I never said that I was an 18 accountant. 19 Q No, no, what is your 20 professional training? 21 A I just started working on 22 campaigns, for the finance departments, 23 budgeting director, the accounting. 24 And then Giuliani was looking 25 for a controller and they interviewed me and</p>	<p>Page 66</p> <p>1 RYAN MEDRANO 2 Q And did you ever have any 3 conversations with Mr. Giuliani about that 4 topic? 5 A No. 6 Q Does Giuliani Communications 7 ever distribute any profits? 8 A I think we paid some of his 9 taxes last year, but that was it. He didn't 10 collect any money early for the first year, 11 I believe. 12 And then I believe this year 13 we might have paid him. 14 Q And when you say, "we might 15 have paid him," what do you mean? 16 A Meaning I'm pretty sure we 17 sent wires to him, I would have to look at 18 the records. 19 Q And those wires, to the 20 extent that you sent -- let me be precise. 21 When you say "we went wires," you mean 22 Giuliani Communications? 23 A The entity, Giuliani 24 Communications. 25 Q Sent wires to Mr. Giuliani?</p>
<p>1 RYAN MEDRANO 2 he liked me, and I've been there off and on 3 for the past 27 years. 4 Q And do you have any 5 professional degrees? 6 A Not in accounting. Yeah, I 7 do, in psychology. 8 Q And do you have any 9 professional licenses? 10 A No. 11 Q Sorry, I just thought I would 12 ask. 13 So, are you aware of any 14 reason why Mr. Giuliani couldn't have been 15 paid directly for his services? 16 A Again, the accountants set it 17 up this way because he had to pay other 18 people who are working for him, because some 19 people are with him a lot. 20 Q Did you ever have any 21 conversations with the accountants about 22 that topic? 23 A Not really. They would set 24 it up, so I said okay, this is the entity, 25 then. That's where we went with it.</p>	<p>Page 67</p> <p>1 RYAN MEDRANO 2 A Correct. 3 Q And you would have been the 4 person responsible for executing those 5 wires? 6 A Yes. 7 Q And to the extent you sent 8 wires to Mr. Giuliani, those would have 9 represented profit distributions to 10 Mr. Giuliani? 11 A Well, I was told it was -- 12 yeah, I guess so. Because he used it to pay 13 taxes that he owed on his property. 14 Q Okay. 15 So Mr. Giuliani -- excuse me, 16 Mr. Giuliani's relationship with Giuliani 17 Communications was that of an owner, is that 18 accurate? 19 A Yes. 20 Q So, he, in that capacity, did 21 he have an entitlement to all of the profits 22 of Giuliani Communications? 23 A Well, that's the thing. It's 24 an LLC, and I'm assuming it's a single 25 member, because I believe he's the only one,</p>

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<p>1 RYAN MEDRANO 2 and an LLC could have various partners in 3 it, so -- 4 Q Okay. Is it your 5 understanding that Mr. Giuliani is the sole 6 member of Giuliani Communications? 7 A Yes. I don't believe anyone 8 has been added to the organization as an 9 owner, so yes. 10 Q So, if Giuliani 11 Communications had profits, would anybody 12 other than Mr. Giuliani be entitled to those 13 profits? 14 A No. I'm pretty sure it's the 15 same. 16 Q And how does Giuliani 17 Communications decide when to distribute 18 profits to its owner? 19 A I believe it's when he had 20 his -- he didn't take any money the first 21 year, that's for sure. 22 And then I think the second 23 year, it's around each quarterly tax return. 24 Q Okay. And is there -- 25 A I would have to look, I would</p>	<p>Page 70</p> <p>1 RYAN MEDRANO 2 have to look. 3 Q When you say taxes, you are 4 referring to Mr. Giuliani's personal taxes, 5 is that accurate? 6 A Yes, I believe property taxes 7 and whatever other taxes he owes. I don't 8 really ask the question. 9 Q Does Giuliani Communications 10 have an operating agreement? 11 A Yes, I would have to track 12 one down, but I'm sure there is one. 13 Q Do you have a copy of that 14 operating agreement? 15 A I would have to look. 16 Q How do you know that Giuliani 17 Communications was making distributions to 18 Mr. Giuliani for the purpose of 19 Mr. Giuliani's taxes? 20 A That's the way Maria would 21 tell me, that's what he's using it for. 22 Q As far as you know, could it 23 have been for any other expenses of 24 Mr. Giuliani's? 25 A I don't know.</p>
<p>1 RYAN MEDRANO 2 have to look. 3 Q So is it fair to say that 4 it's up to Mr. Giuliani when to take profit 5 distributions from Giuliani Communications? 6 A I don't know if it's -- I 7 assume so, but he talks to Maria as well, 8 I'm sure. I don't know the process. 9 Q Does Maria have any legal 10 authority to decide when profit 11 distributions are made from Giuliani 12 Communications? 13 A I'm not sure about legal 14 authority, but since he's running the show, 15 I would get a text where she said please, or 16 a call, please distribute money to him, 17 because he needs to pay his taxes. 18 Q Okay. So the distribution, 19 it sounds like what you're saying in your 20 experience, distributions of profits to 21 Mr. Giuliani would respond to Mr. Giuliani's 22 needs as they arose, is that fair to say? 23 A I believe so. 24 His taxes I think 100 percent 25 of the time, but I could be wrong, I would</p>	<p>Page 71</p> <p>1 RYAN MEDRANO 2 Q If Dr. Ryan asked you to make 3 a distribution of profits for -- to 4 Mr. Giuliani from Giuliani Communications, 5 is there any reason you can think of why you 6 would refuse a request like that? 7 A Not that I know of. I'm 8 trying to think the timeline there, because 9 at one point, whoever his lawyer was at the 10 time said you can't -- I don't remember 11 whether it was -- maybe -- just to contact 12 me or the accountant if he could make a 13 distribution. 14 I don't remember the 15 conversation. 16 Q In your experience -- 17 MR. NATHAN: Or strike that. 18 Q -- was there ever an occasion 19 when you did refuse a request to make a 20 distribution of profits from Giuliani 21 Communications? 22 A No. 23 Q Just returning, a moment ago 24 you testified that Dr. Ryan would tell you 25 that Mr. Giuliani would use the distribution</p>

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<p>1 RYAN MEDRANO 2 to pay his personal taxes. 3 Do you have any other reason 4 for thinking that to be the -- for thinking 5 that to be true? 6 A No, I didn't really question 7 it. I mean, that's what he decided. 8 Q You don't know one way or the 9 other what Mr. Giuliani did with the profits 10 once they were distributed to him? 11 A Correct, that's not my thing 12 to do in the company. 13 Q And it wouldn't have mattered 14 to you one way or the other what the reason 15 was, provided the request came from 16 Mr. Giuliani or from Dr. Ryan, is that 17 right? 18 A Correct. 19 Q And just to make sure I'm 20 clear, it's fair to say that profit 21 distributions from Giuliani Communications 22 are done on an ad hoc basis? 23 A I believe they were done 24 quarterly -- not -- I think it was when the 25 tax returns were due, so that's why he</p>	<p>Page 74</p> <p>1 RYAN MEDRANO 2 A The current company, yes. 3 Q What's the current company? 4 A Standard U.S.A., LLC. 5 Q And what is Standard U.S.A., 6 LLC? 7 A It's an entity that is 8 similar to Communications, I believe it's 9 domiciled in Florida, just like 10 Communications. 11 I was told this is the 12 entity, and that's where it started in late 13 August, 2024, September, maybe. I don't 14 know exactly about that. 15 Q This may be a natural time 16 for a break. If that's all right with you, 17 Mr. Medrano, we can go off the record for a 18 few minutes, let you have a break, give the 19 court reporter a break. 20 Is that all right with you? 21 A I want Steve on it, because 22 he wants to get out of here, man. Five 23 minutes. 24 Q Why don't we come back at 25 10:30.</p>
<p>1 RYAN MEDRANO 2 requested them. 3 Q But the reason for the 4 timing, as far as you are aware, was 5 Mr. Giuliani's own need to pay taxes, rather 6 than some internal rule that applied to 7 Giuliani Communications? 8 A Correct. That was -- 9 Q And if Mr. Giuliani's own 10 personal financial needs had been slightly 11 different, then the profit distributions 12 could have been changed to match those needs 13 instead? 14 A I'm sorry, one more time? 15 Q If Mr. Giuliani -- if the 16 timing of Mr. Giuliani's financial needs had 17 been different, the distributions of profits 18 from Giuliani Communications could also have 19 been changed to meet that timing? 20 A Yes, if they decided. 21 Q I would just like to ask now 22 about -- well, I think you mentioned another 23 LLC. 24 Are there any other LLCs in 25 which Mr. Giuliani has an interest?</p>	<p>Page 75</p> <p>1 RYAN MEDRANO 2 A Okay, perfect. 3 THE VIDEOGRAPHER: Going off 4 the record, the time is 10:20 a.m., 5 this is the end of media unit 1. 6 (At this point in the proceedings 7 there was a recess, after which the 8 deposition continued as follows: 9 THE VIDEOGRAPHER: We are 10 back on the record, the time is 11 10:31 a.m. This is the beginning of 12 media unit 2. 13 Q Mr. Medrano, during the break 14 did you discuss your deposition testimony 15 with anyone? 16 A No. 17 Q You mentioned earlier that 18 you had some difficulty opening bank 19 accounts with Mr. Giuliani's name on them. 20 Other than the Parkside 21 account you were discussing, did you open 22 any other accounts with Mr. Giuliani on the 23 account? 24 A I did not open it. Maria 25 opened the bank account in Florida for</p>

20 (Pages 74 - 77)

<p>1 RYAN MEDRANO 2 Standard U.S.A., LLC. 3 Q Have you opened any bank 4 accounts in Maria Ryan's name? 5 A No. 6 Q Have you opened any bank 7 accounts in Ted Goodman's name? 8 A No. 9 Q Have you opened any other 10 bank accounts in Giuliani Communications' 11 name? 12 A No. 13 Q And other than the bank 14 account that you just mentioned in Florida, 15 are you aware of any other bank accounts for 16 Standard U.S.A., LLC? 17 A No. 18 Q Okay. Let's talk about 19 Standard U.S.A., LLC. 20 Was that -- 21 A It's what he does his media 22 things through. It handles his business 23 dealings, his media. 24 Q It's an LLC, you say, is that 25 right?</p>	<p>Page 78</p> <p>1 RYAN MEDRANO 2 Q Does Standard U.S.A., LLC 3 have any activities other than being the 4 entity through which Mr. Giuliani does his 5 business? 6 A No. 7 Q What is the nature of the 8 business that Mr. Giuliani conducts through 9 Standard U.S.A., LLC? 10 A His radio show, and anything 11 he promotes. I believe that coffee was the 12 most recent one that was in the press. 13 So it's an entity that 14 captures whatever he's pushing or selling or 15 what advertising space he sells on his radio 16 show. 17 Q When you say his radio show, 18 what do you mean? 19 A I don't know, because I 20 haven't listened to it in a while, but I 21 think he's on daily still, I just -- I'm not 22 involved in the day-to-day, sorry. 23 Q And you mentioned something 24 about coffee. What did you mean by that? 25 A There is, one of his new</p>
<p>1 RYAN MEDRANO 2 A Yes. 3 Q And do you know how many 4 members it has? 5 A I believe three, but I don't 6 know the percentages. 7 Q And who are those three? 8 A Mayor Giuliani, Maria Ryan 9 and Ted Goodman. 10 Q Okay. 11 And you don't know the 12 percentages. Do you know the relative 13 shares? 14 A He is definitely around 80 15 and either it's 20 or 10 the other two 16 split, I just don't know. 17 Q As far as you know, 18 Mr. Giuliani is the majority owner of the 19 LLC? 20 A I believe so. 21 Q Do you know why Maria Ryan 22 and Ted Goodman were given ownership shares 23 of Standard U.S.A., LLC? 24 A I'm not privy to that, I 25 don't know.</p>	<p>Page 79</p> <p>1 RYAN MEDRANO 2 sponsors that was in the paper a couple of 3 months ago, it's a coffee brand he 4 advertises. 5 Q How did you learn about that? 6 A I believe I have a contract 7 from them. 8 Q Who provided you with that 9 contract? 10 A Maria, I believe. 11 Q Did you negotiate the 12 contract? 13 A No. 14 Q So you learned about it from 15 Maria? 16 A Yes. 17 Q Do you know who negotiated 18 the contract? 19 A I'm assuming Maria. 20 Q Was that contract with 21 Standard U.S.A., LLC? 22 A Yes. 23 Q Are you aware of any other 24 contracts that Standard U.S.A., LLC has 25 executed?</p>

21 (Pages 78 - 81)

<p style="text-align: right;">Page 82</p> <p>1 RYAN MEDRANO 2 A Yes, he has several. He has 3 the Newsmax, and then he has Red Eagle, and 4 what else is on there? 5 I would have to look, but 6 those are the big ones that he receives. 7 Q How long has Standard U.S.A., 8 LLC been in existence? 9 A I believe around September 10 1st of this year. 11 Q Do you know why it was set up 12 on that date? 13 A No, not really. 14 Q The contracts you mentioned, 15 are they in addition to the contracts that 16 Giuliani Communications LLC had? 17 A They have new contracts, so I 18 think that's the only other one, I'm trying 19 to remember. 20 I would just have to look at 21 the records, at the bank statements. 22 Q Okay. How do you receive -- 23 MR. NATHAN: Strike that. 24 Q Generally speaking, how could 25 you learn about the business activities of</p>	<p style="text-align: right;">Page 84</p> <p>1 RYAN MEDRANO 2 Do you know -- do you know 3 how Standard U.S.A. earns revenues? 4 A It's through those contracts 5 I just mentioned, that's where the revenue 6 comes in. 7 Q Okay. And how much revenue 8 comes in? 9 A It just depends on how many 10 advertising spots he does. 11 Q Okay. Are you aware since 12 September 1, 2024 how much revenue Standard 13 has earned? 14 A I would have to look it up. 15 Q But do you have documents 16 that would show how much revenue? 17 A Yeah, the bank statements, 18 yeah, yeah, for sure. 19 Q And you have access to all of 20 Standard's bank statements? 21 A Yes. 22 Q I think you mentioned setting 23 up a bank account for Standard in Florida, 24 could you tell me everything you know about 25 that bank account?</p>
<p style="text-align: right;">Page 83</p> <p>1 RYAN MEDRANO 2 Standard U.S.A., LLC? 3 A Through Maria. 4 Q What's your understanding of 5 Maria's role in that company? 6 A The manager. She's running 7 it, she negotiates the contracts. 8 Q What's your understanding of 9 Ted Goodman's role in the company? 10 A He is a consultant that he 11 hired him for media, and then just anything 12 Giuliani needs, Ted will help him. 13 He is an old guy, so he's in 14 his '80s, so he needs people. 15 Q And what's your understanding 16 of Mr. Giuliani's role in the company? 17 A He again is like, if I was 18 writing a policy on it, he would be the key 19 man. 20 Q You mentioned a contract with 21 something having to do with coffee. Do you 22 recall who the counterparty is for that 23 contract? 24 A Yeah, it's Burke Coffee. 25 Q Burke, okay.</p>	<p style="text-align: right;">Page 85</p> <p>1 RYAN MEDRANO 2 A It's the only account. 3 Q Okay. And could you tell me 4 what you know about it? 5 A It's a regular business 6 checking account. 7 Q And what bank is it at? 8 A I think FINANCIAL. I 9 didn't -- 10 Q I'm sorry, you understand why 11 I was confused. You are not saying you 12 think the name of the bank -- 13 A I've got you. Sorry, I 14 didn't do that -- iThink Financial Credit 15 Union. It's somewhere in South Florida. 16 Q So the name of the bank is 17 iThink? 18 A Yes. 19 Q Is that one word, iThink? 20 A ITthink, yes, is all one 21 word. I've been to their concert venues, 22 Financial Credit Union. 23 Q That's helpful, thank you. 24 And Standard has one bank 25 account at iThink Financial?</p>

22 (Pages 82 - 85)

<p>1 RYAN MEDRANO 2 A Just one. 3 Q And no other bank accounts, 4 is that accurate? 5 A Yes, no. 6 Q And are you a -- 7 A Sorry, Steve, you told me not 8 to talk while he's talking, and I'm trying. 9 Sorry, Mr. Nathan, what did you say? 10 Q Standard has one bank account 11 at iTthink Financial, and no other bank 12 accounts? 13 A Correct. 14 Q Thank you. 15 And are you a signer on that 16 account? 17 A Yes, sir. 18 Q Are there any other signers 19 on the account? 20 A Maria is on this one. 21 Q Okay. Is Mr. Giuliani a 22 signer on the account? 23 A I don't believe so. 24 Q And why not? 25 A I don't know. They opened</p>	<p>Page 86</p> <p>1 RYAN MEDRANO 2 A The same names as 3 Communications. 4 Q And who are they? 5 A Mayor Giuliani, Maria Ryan, 6 Ted Goodman, Michael Ragusa, myself and Joe 7 Ricci. 8 Q Are those people W-2 9 employees of Standard U.S.A.? 10 A Maria Ryan is the W-2. 11 Q Maria Ryan is also a part 12 owner of Standard U.S.A., is that correct? 13 A Yes, I believe so, but I 14 remember going about, talking to them about 15 this, and somehow the accountant cleared it. 16 Q So, I'm sorry, you just 17 testified you remember talking to Maria Ryan 18 and Mr. Giuliani about this, is that 19 accurate? 20 A No, I was talking to Joe 21 Ricci about it, because one of the rules is 22 you can't be a 1099 and a W-2 at the same 23 time. 24 I believe you can, if you 25 start as one you can do the other, as long</p>
<p>1 RYAN MEDRANO 2 that without -- I had nothing to do with 3 that. I was told one day this is the 4 account. 5 Q As a signer, did you have any 6 role in opening the account? 7 A Just what they needed, my -- 8 iTthink, they needed a passport, and maybe a 9 credit card or something to show I'm a 10 legitimate person. 11 Q Okay. 12 Have you ever executed any 13 financial transactions on behalf of Standard 14 U.S.A.? 15 A Yes. 16 Q Could you tell me about 17 those? 18 A Your basic expenses, again, 19 the people that work for them, and any type 20 of equipment they use for their show and any 21 technology they may use. 22 Q I'm sorry, go ahead. 23 A Just business expenses. 24 Q And who works for Standard 25 U.S.A.?</p>	<p>Page 87</p> <p>1 RYAN MEDRANO 2 as there is a definite cut-off. 3 But I don't know how they 4 resolved it, but they said legally they are 5 okay. 6 Q Okay, but it was a conscious 7 decision to make Maria Ryan both an owner 8 and a W-2 employee, is that right? 9 A I wasn't in on those 10 conversations when they formed the thing. 11 Q I'm sorry, is Maria Ryan a 12 1099 employee of Standard U.S.A.? 13 A No, she's being paid via a 14 W-2 currently. 15 I would have to speak to Joe 16 Ricci on it to figure out how it was 17 resolved. 18 Q Joe Ricci would know the 19 answer to that question? 20 A Yes, I believe so. 21 Q And generally speaking, Joe 22 Ricci would know the answer to questions 23 regarding the finances of Mr. Giuliani's 24 companies that you might not know? 25 A Yeah, he should; but he's --</p>

23 (Pages 86 - 89)

<p>1 RYAN MEDRANO 2 does his taxes, so that's the only thing 3 that would have came up in the early part of 4 2024. 5 Q How would it have been 6 relevant to Mr. Giuliani's taxes? 7 A Well, if he's got to claim it 8 as his residence, his tax place has changed, 9 so I don't know what he did. Eventually Joe 10 is the one who knows. 11 Q And the first conversations 12 you had about -- when would you have 13 spoke -- 14 MR. NATHAN: Strike that, I'm 15 sorry. 16 Q I think you just testified 17 that you might have spoken to Joe about it 18 in the early part of 2024. 19 Is that the earliest you 20 would have spoken to Joe Ricci about Mr. 21 Giuliani's tax situation arising from 22 spending more time in Florida? 23 A Well, I think so, because the 24 only thing I would say is you have to do 25 like change of residence and all that stuff,</p>	<p>Page 98</p> <p>1 RYAN MEDRANO 2 be on your radar. 3 Q I would like to just go back 4 to Standard U.S.A. 5 I think I asked whether you 6 knew anything about Standard U.S.A.'s 7 revenues. 8 Could you give me a sense of 9 how much money Standard U.S.A. takes in? 10 A It varies upon his -- the ads 11 that he's selling. 12 So anywhere from \$20 to \$40, 13 I believe, but I would have to look. 14 Q 20 to 40 what? 15 A \$20 to \$40,000 a month, but I 16 would have to look at the bank statements. 17 Q So Standard has been in 18 existence since September 2024, is that 19 right? 20 A Yes, I don't know the exact 21 date, but it's around there. 22 Q So that's four months, do you 23 agree? 24 A Yes. 25 Q Do you have records of how</p>
<p>1 RYAN MEDRANO 2 so I don't know what happened afterwards. 3 I think he was actually on 4 the phone call we were talking about closing 5 the entities. 6 Q That phone call, when did 7 that occur? 8 A At the beginning of the 2024, 9 in the first quarter, at least. 10 Q Okay. And when you say you 11 have to do like change of residence, what do 12 you mean by that? 13 A You just don't -- you have to 14 file residency. That's why, I don't know if 15 he changed any of his licenses or residency. 16 When I came to Missouri, I 17 had to tell them, from New York. 18 Q But you don't have any 19 personal knowledge of any changes of that 20 kind that Mr. Giuliani may have made? 21 A No. 22 Q And you didn't follow up with 23 Joe Ricci about any of that? 24 A No. I mentioned to him, just 25 to say, hey, this is something that should</p>	<p>Page 99</p> <p>1 RYAN MEDRANO 2 much Standard has taken in in each of those 3 four months? 4 A Yes, it's all on the bank 5 statement. 6 Q Okay. And do you have 7 records of Standard's expenses during those 8 four months? 9 A Yes. There isn't much, it's 10 just salaries, employees, and whatever 11 expenses they have to run the business. 12 Q And does Standard have any 13 profits during those four months? 14 A A little, not much. 15 Q Has Standard distributed -- 16 sorry, when you say, "a little, not much," 17 could you give me a ballpark? 18 A Probably \$10,000 a month, 19 say, net. 20 Q And has Standard 21 distributed -- excuse me, has Standard 22 distributed any of those profits during its 23 existence? 24 A I don't think so, but I have 25 to look.</p>

<p style="text-align: right;">Page 102</p> <p>1 RYAN MEDRANO 2 Q But you would have a record 3 of any profit distributions that Standard 4 has made? 5 A Yes. 6 Q And who would those profit 7 distributions have been to? 8 A Rudy, if I sent one to him, I 9 would just have to look, Giuliani. 10 Q Would you have sent any 11 profit distributions to Maria or Ted? 12 A No. Ted is on a retainer, 13 and he may get something, I guess, at the 14 end of the year as a bonus. 15 Maria is salary, so I don't 16 think she's going to get a bonus. Maybe she 17 will, I don't know. 18 Q Do Maria or Ted have any 19 entitlement to profits from Standard U.S.A.? 20 A I don't understand the 21 question. 22 Q That's okay. 23 Maria and Ted are part owners 24 of Standard U.S.A., is that correct? 25 A I believe so.</p>	<p style="text-align: right;">Page 104</p> <p>1 RYAN MEDRANO 2 copy. 3 Q You say you would have to 4 look at the operating agreement. So you 5 have seen it at some point? 6 A I think so, but I'm not sure. 7 Q If you had seen it, when 8 would that have been? 9 A Probably after it was formed. 10 Q And how do you know the 11 operating agreement exists if you haven't 12 seen it? 13 A Because I know. 14 MR. NATHAN: Strike that. 15 You didn't testify that you hadn't 16 seen it. 17 Q If you are not sure whether 18 you've seen it or not, how do you know the 19 operating agreement exists? 20 A Well, by dealing with these 21 people, I would say that an operating 22 agreement, every entity has to have one. 23 So I'm assuming they have it. 24 Why would they stop? It would be out of 25 character for them.</p>
<p style="text-align: right;">Page 103</p> <p>1 RYAN MEDRANO 2 Q Does their ownership stake, 3 as far as you know, does their ownership 4 stake entitle them to any share of 5 Standard's profits? 6 A I have to read the operating 7 agreement. I should probably read that 8 through. 9 Q And Standard has an operating 10 agreement, is that correct? 11 A I believe so. 12 Q And do you have a copy of the 13 operating agreement? 14 A I would have to look. I 15 don't know if they sent me a copy or not. 16 Q Okay. 17 A I know one exists, so -- 18 Q Are there any other legal 19 documents or are there any documents of any 20 kind that would detail the members of 21 Standard U.S.A.'s respective entitlement to 22 profits? 23 A It's only the operating 24 agreement, so I would have to look to see if 25 I have a copy, or if they could send me a</p>	<p style="text-align: right;">Page 105</p> <p>1 RYAN MEDRANO 2 Q Okay. 3 When it comes time to pay out 4 profit distributions from Standard U.S.A., 5 how do you know how much and to whom you are 6 supposed to pay? 7 A I don't think I've paid any 8 out, but I would have to look, I just don't 9 know, without being able to look for the 10 operating agreement, if I have it, and if I 11 paid anything out. 12 Q And if you were asked to pay 13 out a profit distribution, would you consult 14 the operating agreement before you made the 15 payment? 16 A I should, but I probably 17 didn't. So -- 18 Q Did you just pay based on 19 what they tell you? 20 A Correct. 21 Q And by they, could that mean 22 Mr. Giuliani? 23 A No, it's Maria is usually the 24 one who tells me. 25 Q So generally, or generally or</p>

27 (Pages 102 - 105)

<p style="text-align: right;">Page 106</p> <p>1 RYAN MEDRANO 2 exclusively it would be Maria Ryan who told 3 you what to pay? 4 A Yes. 5 Q And you would pay what she 6 told you? 7 A Correct. I would just have 8 to look -- I don't remember, because I know 9 there was something about one of their 10 attorneys, I don't know which one, said you 11 can't pay him or something like that. 12 I don't remember if we paid 13 him or not, that's why I would have to look 14 at the records. 15 Q So you just testified, "I 16 would have to look, I don't remember, 17 because I know there was something about one 18 of their attorneys, I don't know which one, 19 said you can't pay him or something like 20 that." 21 A Yes. 22 Q What do you mean by that? 23 A They said hold off on any 24 payments. I just don't remember which one, 25 because he has several attorneys.</p>	<p style="text-align: right;">Page 108</p> <p>1 RYAN MEDRANO 2 A I don't know, I don't 3 remember which one. Or maybe I talked to 4 Maria about it. 5 I just remember that that was 6 something I had to watch. 7 Q Did you regularly communicate 8 with Mr. Giuliani's attorneys? 9 A Not really, no. 10 Q Are you familiar with 11 Mr. Giuliani's attorneys? 12 A Well, they come and go, so I 13 don't really know. Joe is a new one, so. 14 Q Was this conversation that 15 you are talking about it, was it with Joe? 16 A Joe, maybe. I don't know, 17 who is the person before him? 18 Q Do you know who Ken Carusso 19 is? 20 A It may have been Ken Carusso. 21 Yes, I do know who he is, but I think he 22 was -- he was right around that time, so 23 maybe he gave instructions. I don't know 24 who. 25 Q Do you know who Gary Rosen</p>
<p style="text-align: right;">Page 107</p> <p>1 RYAN MEDRANO 2 I would just have to look at 3 the bank statement to see what happened. 4 Q So, just so I understand, one 5 of Mr. Giuliani's attorneys told you that 6 you could not pay Mr. Giuliani? 7 A I believe so, yes. 8 Q Do you remember when that 9 occurred? 10 A I don't know exactly, but I 11 think it was right around when Standard 12 U.S.A. was in operation. 13 Q So, I think you testified 14 that Standard U.S.A. was formed September 15 2024, is that right? 16 A Yes, somewhere around that 17 area. It could have been late August, I 18 don't know the exact date. 19 Q So this conversation that you 20 are referring to happened just before 21 Standard U.S.A. was formed? 22 A No, it was actually 23 functioning at that point, I believe. 24 Q Do you recall which attorney 25 made this comment to you?</p>	<p style="text-align: right;">Page 109</p> <p>1 RYAN MEDRANO 2 is? 3 A I know, yes, I know Gary 4 Rosen's name. 5 Q And who is Gary Rosen? 6 A He is an attorney. 7 Q Is he one of Mr. Giuliani's 8 attorneys? 9 A I don't know. I thought he 10 was a friend, but I don't know if he's a 11 paid guy or whatever. 12 Q Do you know who David 13 Lebkowsky is? 14 A No. 15 Q Do you know who Gary Fischhoff 16 is? 17 A I know the name. I don't 18 know him. 19 I think he was -- was he with 20 the Heath Berger firm? Because that's 21 another attorney. 22 Q What's your understanding of 23 who Heath Berger is? 24 A A bankruptcy attorney; I 25 believe.</p>

<p style="text-align: right;">Page 110</p> <p>1 RYAN MEDRANO 2 Q Do you recall if the 3 conversation that you had about not paying 4 Mr. Giuliani was with any of those 5 individuals? 6 I can repeat them if you 7 need. 8 A I don't know if -- I think 9 Maria told me. 10 Q So Maria told you that 11 Mr. Giuliani cannot be paid directly, is 12 that accurate? 13 A Just I don't think he can be 14 paid. I don't recall the conversation, the 15 exact wording. 16 Q So, just so I'm clear about 17 what you do recall, you recall that you had 18 a conversation sometime in late August or 19 early September, is that about right? 20 A In September, I believe 21 September, October, maybe, because -- 22 Q And it was either with 23 Mr. Giuliani's attorneys or with Maria Ryan? 24 A I believe it was Maria, 25 though, yes.</p>	<p style="text-align: right;">Page 112</p> <p>1 RYAN MEDRANO 2 Mr. Giuliani money? 3 A Does Standard U.S.A. -- 4 technically, I don't really know. There are 5 small profits, but I just would have to 6 check to see if it's paid, I don't know. 7 Q If Maria Ryan told you to 8 hold off paying Mr. Giuliani money, what 9 would your understanding then be of the 10 obligation to pay Mr. Giuliani going 11 forward? 12 A I just assume when they say 13 it's okay, then it's okay, but up until 14 then -- 15 Q But does that mean that 16 Standard U.S.A. owes Mr. Giuliani money in 17 the future? 18 A I don't know. I would have 19 to see the operating agreement, I don't 20 really know, I'm not technical. 21 Q So let me ask a different 22 way. 23 Does Mr. Giuliani have any 24 entitlement to the profits of Standard 25 U.S.A., LLC?</p>
<p style="text-align: right;">Page 111</p> <p>1 RYAN MEDRANO 2 Q And the substance of the 3 conversation was that you could not pay 4 Mr. Giuliani? 5 A Right. 6 Q And was it any broader, was 7 it any more specific than that? Did -- 8 A No, it was you have to hold 9 off, I think, and then that was it. That's 10 why I have to look at the bank statements to 11 see if I actually paid anything out or not. 12 Q When you say paid anything 13 out, are we only talking about Standard 14 U.S.A.? 15 A Correct, at this point. The 16 other accounts were closed. 17 Q So this conversation that you 18 had didn't have to do with Giuliani 19 Communications? 20 A No; no, that account was 21 closed in August. 22 Q So it only had to do with 23 Standard U.S.A.? 24 A Correct. 25 Q Does Standard U.S.A. owe</p>	<p style="text-align: right;">Page 113</p> <p>1 RYAN MEDRANO 2 A I would have to read the 3 operating agreement, but I'm assuming, yes, 4 but I shouldn't assume. 5 Q Just so your testimony is 6 clear, has Standard U.S.A. ever distributed 7 profits to Mr. Giuliani or -- Mr. Giuliani 8 or anybody else? 9 A Not the other two, but I 10 would have to look at Giuliani. That's why 11 I said I would have to look. 12 Q But it's possible as far as 13 you know -- 14 A It's possible, yes. 15 Q -- that some profits have 16 been distributed? 17 A Yes, it's possible; that 18 might have triggered the conversation. So 19 we will see. I don't recall what happened. 20 Q Do you -- so if Maria Ryan or 21 anyone, for that matter, told you to hold 22 off paying Mr. Giuliani out of Standard 23 U.S.A., LLC, what happened to that money? 24 A It's in the bank account. 25 Q So any -- outside from the</p>

29 (Pages 110 - 113)

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<p style="text-align: right;">Page 114</p> <p>1 RYAN MEDRANO 2 bank account, does Standard U.S.A. have any 3 other assets? 4 A No. 5 Q So any of the funds that 6 Mr. Giuliani -- 7 MR. NATHAN: Strike that. 8 Q Other than the operating 9 agreement and the bank statements, are there 10 any other records of Standard U.S.A.'s 11 activities? 12 A That's it for now, yeah. 13 Q Any other financial records? 14 A In Quickbooks, yes. I don't 15 know. 16 Q And when you say Quickbooks, 17 are you referring to records that you 18 possess? 19 A Yes. I just have to -- there 20 is some information I had to put in there 21 for sure. 22 Q And what type of records are 23 those? 24 A It's an accounting system. 25 Q Okay.</p>	<p style="text-align: right;">Page 116</p> <p>1 RYAN MEDRANO 2 A Phone call. 3 Q Does she ever e-mail you 4 about it? 5 A Very rarely, but if she's 6 sending a contract, maybe she'll do it that 7 way. 8 Q Does she ever send you text 9 messages about it? 10 A Rarely. 11 Q And why would she be sending 12 you contracts for Standard U.S.A.? 13 A She is managing it, she's 14 managing the company. 15 Q And why do you need to have 16 the contracts? 17 A To have a copy on record. 18 Q Why is it important to have a 19 copy on record? 20 A It's just by law you should 21 have a record, so -- 22 Q Do you have records of all of 23 Standard U.S.A.'s contracts? 24 A I believe so. 25 Q I think you said before that</p>
<p style="text-align: right;">Page 115</p> <p>1 RYAN MEDRANO 2 Is that the way that you 3 maintain the financial accounts of Standard 4 U.S.A.? 5 A Yes. 6 Q And does anybody else 7 maintain the financial accounts for Standard 8 U.S.A. 9 A No. 10 Q So the only records that 11 exist of Standard -- 12 MR. NATHAN: Well, strike 13 that. 14 Q The only records that you are 15 aware of for Standard U.S.A. would be the 16 bank statements, the operating agreement, if 17 one exists, and the records you maintain in 18 Quickbooks, is that accurate? 19 A Correct, yes. 20 Q Are you aware of Maria Ryan 21 maintaining any records for Standard U.S.A.? 22 A No. 23 Q When you communicate with 24 Dr. Ryan about Standard U.S.A., how do you 25 communicate with her?</p>	<p style="text-align: right;">Page 117</p> <p>1 RYAN MEDRANO 2 you know Gary Rosen. Could you tell me who 3 he is? 4 A I believe he's a friend of 5 Rudy's from the past. I don't know really 6 how the relationship or how far back they 7 go. 8 Q Do you know whether Gary 9 Rosen is an attorney? 10 A Yes, he's an attorney. 11 Q Do you know whether he's done 12 any legal work for Mr. Giuliani? 13 A I don't know if he's advised 14 him, but they are friends, so. 15 Q How about for Standard 16 U.S.A., LLC? 17 A For Standard U.S.A. he 18 probably helped him at the beginning, I'm 19 assuming. 20 I don't really know what 21 happened at the beginning. 22 Q Why do you assume that he 23 helped him at the beginning? 24 A Because they needed help, I 25 believe, with the legal documents.</p>

<p style="text-align: right;">Page 118</p> <p>1 RYAN MEDRANO 2 I didn't -- I wasn't involved 3 in that, so -- 4 Q You mentioned Standard 5 U.S.A.'s contracts. To what extent were 6 those contracts continuous with legal 7 relationships that Giuliani Communications 8 had had?</p> <p>9 A I'm sorry, could you -- 10 Q I will try that one again. 11 To what extent did Giuliani 12 Communications' contracts continue with 13 Standard U.S.A.?</p> <p>14 A They had to sign new 15 contracts, that's for sure. Pretty much the 16 same.</p> <p>17 Q So you, so when you say 18 pretty much the same, what do you mean?</p> <p>19 A Well, if the contract for 20 whatever work they are doing, they are still 21 doing the same work, just with a different 22 entity.</p> <p>23 Q So Standard U.S.A. would do 24 the same work as Giuliani Communications 25 LLC?</p>	<p style="text-align: right;">Page 120</p> <p>1 RYAN MEDRANO 2 Mr. Giuliani could have access to a bank 3 account? 4 A Well, so he could make a 5 living, yes. 6 Q When you say make a living, 7 what do you mean?</p> <p>8 A Meaning so he could have some 9 money to eat and exist.</p> <p>10 Q And why couldn't he do that 11 without having a corporate -- excuse me, 12 without having an LLC?</p> <p>13 A I just don't think he has 14 that much money left, but I don't know. I'm 15 not -- I stay out of the day-to-day personal 16 stuff.</p> <p>17 Q I guess I am curious. Why 18 was it necessary to form an LLC to achieve 19 that goal?</p> <p>20 A I don't know. I wasn't privy 21 in those start-up meetings.</p> <p>22 Q Are you aware of any reason 23 why Mr. Giuliani decided to form a new LLC 24 rather than seek to achieve any of these 25 goals through -- in his own name?</p>
<p style="text-align: right;">Page 119</p> <p>1 RYAN MEDRANO 2 A Well, it's his media, 3 whatever he does with his media, that's what 4 it's handling. 5 Q So, if Standard U.S.A. was 6 continuing the same work that Giuliani 7 Communications had been doing, why did 8 Mr. Giuliani need to set up a new LLC? 9 A I don't know. Communications 10 was frozen, the account, so how are you 11 going to do business? 12 Q If Giuliani Communications' 13 account was frozen, why couldn't Giuliani 14 Communications set up a different account? 15 A I don't know. I wasn't privy 16 to why this happened the way it happened. 17 Q So, to the best of your 18 understanding, the reason for forming 19 Standard U.S.A., LLC was that Giuliani 20 Communications was prevented from continuing 21 its business? 22 A Yes. 23 Q So, to the best of your 24 understanding, the reason for forming 25 Standard U.S.A., LLC was so that</p>	<p style="text-align: right;">Page 121</p> <p>1 RYAN MEDRANO 2 A No, I don't know. 3 Q Is Standard U.S.A., LLC's 4 bank account currently frozen? 5 A No. Not that I know of, so. 6 Q Is Standard U.S.A. actively 7 transacting in its bank account? 8 A Yes. 9 Q Has Standard U.S.A. made any 10 payments since it has been in existence? 11 A Made payments? 12 Q Of any kind. 13 A Of course. I told you they 14 paid business expenses, people that worked 15 for them, technology stuff that they rent 16 and use. 17 Q Okay. But not the profits 18 that Mr. Giuliani would be entitled to? 19 A I don't think so, but I would 20 have to look. Because I remember that 21 was -- that became an issue, whether we 22 could pay him or not. 23 Q Okay. Are you aware of any 24 of Mr. Giuliani's personal bank accounts? 25 A No, I know of them, but I</p>

<p style="text-align: right;">Page 222</p> <p>1 RYAN MEDRANO 2 Do you know what that means? 3 A I have no idea what that 4 means. Let me make it larger. 5 Q Have you ever seen this 6 contract before? 7 A I have, but I don't know what 8 F/S/O means. 9 Q Were you involved in the 10 negotiation of this contract? 11 A No, man, come on, no. Yeah, 12 I have no idea. 13 I don't know if I have seen 14 this contract. This is -- I must have, if I 15 am on this e-mail, but I didn't -- 16 Q Okay. If you look at 17 paragraph it 6 -- sorry, 9. 18 A 9, okay. 19 Q Where it says Cash 20 Compensation? 21 A Yes. 22 Q You see that it provides for 23 \$100,000 of compensation payable to Giuliani 24 Communications LLC? 25 A Yes.</p>	<p style="text-align: right;">Page 224</p> <p>1 RYAN MEDRANO 2 Q So, this document, you agree, 3 would have to have been prepared after the 4 Parkside account was opened? 5 A I think she's -- Maria must 6 be a fortune teller. Yeah, I don't see how 7 that could possibly be. Hold on. 8 Q If you turn to the next page, 9 you will see signature lines. 10 A Signature lines, yes. 11 Q Do you agree with me that 12 none of these signature lines are dated? 13 A I don't see a date on them, 14 no. 15 Q So, based on the fact that 16 this agreement provides the account number 17 for the Parkside account of Giuliani 18 Communications, do you think it's more 19 likely than not that this document was 20 prepared after the Parkside account was 21 opened? 22 A I believe so; but I'm trying 23 to read what she's saying. "Please reach 24 out to me" -- so, in her wording, I don't 25 know if they want to redo it or what the</p>
<p style="text-align: right;">Page 223</p> <p>1 RYAN MEDRANO 2 Q You see that it says \$25,000 3 on September 6th, 2021? 4 A Yes. 5 Q Has that been paid? 6 A So, it has to have been, 7 Communications had to have been open by '21, 8 then. 9 Q Well, I want to see if I -- 10 if you still think that after you finish 11 reading this paragraph. 12 Do you see 9.2, it says, 13 \$75,000, and then it says, "On the time of 14 commitment to the second interview, payment 15 will be wired to Giuliani Communications at 16 Parkside Financial Bank & Trust"? 17 A Yes. 18 Q And it gives the account 19 number? 20 A Right. 21 Q Does that change your view 22 about when this document would have been 23 prepared? 24 A Yeah, it has to have been -- 25 Parkside wasn't open until '24, so yeah.</p>	<p style="text-align: right;">Page 225</p> <p>1 RYAN MEDRANO 2 deal is, but timing-wise, it's a little odd 3 for sure. 4 Q Well, would it have been 5 possible for that document to have been 6 prepared with that information in 2021? 7 A Yeah, I mean that account 8 wasn't open, so -- 9 Q So would it have been 10 possible for that document to have been 11 prepared and include the account information 12 in 2021? 13 A No, I don't think so. 14 Q So you would agree with me 15 that there is no possibility that the 16 contract attached to this e-mail dates to 17 the original 2021 deal? 18 A Well, the only thing I can 19 think of is maybe they found the contract 20 and then they added in that line. 21 Q Okay. So the only way that 22 that information could have been included in 23 the original contract is if it was added to 24 the contract after the fact? 25 A Right, right. Or even</p>

<p style="text-align: right;">Page 226</p> <p>1 RYAN MEDRANO 2 Giuliani Communications wasn't opened and it 3 might have been GP that he was getting paid 4 through, I don't know. 5 So I don't know the answer to 6 that. 7 Q Okay. And do you recall 8 whether the \$75,000 was wired to Giuliani 9 Communications? 10 A Yes. That I remember. 11 Q And it was wired to Giuliani 12 Communications? 13 A Yeah; yes. 14 Q All right. Why don't we go 15 to tab 75, this will be Exhibit 15. 16 A Okay. 17 (The above described document was 18 marked Exhibit 15 for identification as of 19 this date.) 20 Q Do you see this? 21 A Not yet, it hasn't pulled up. 22 Sorry, there is a delay. 23 Q No problem. 24 A Yes, this is the Burke Brands 25 one.</p>	<p style="text-align: right;">Page 228</p> <p>1 RYAN MEDRANO 2 given for Giuliani Communications, 445 Park 3 Avenue in New York? 4 A Yes, it might have been on 5 her letterhead. I don't know why that's 6 there. 7 Q I'm sorry, you say you're 8 sorry, it might have been on her letterhead? 9 A Yes, on this letterhead. I'm 10 assuming they used -- someone didn't look at 11 it again. 12 Q The contract is dated April 13 23, 2024? 14 A Right. 15 Q Do you recall how much money 16 was ultimately paid Giuliani Communications 17 under this contract? 18 A No, not off the top of my 19 head, I don't know, but it's probably around 20 \$3,000 to \$5,000 a month, starting in May or 21 June, I believe. 22 Q And are those payments still 23 ongoing? 24 A Yeah, yes, they are. They 25 signed a new contract.</p>
<p style="text-align: right;">Page 227</p> <p>1 RYAN MEDRANO 2 Q So you see this as another 3 e-mail from Maria Ryan you are copied on the 4 e-mail, and attached is a contract between 5 Giuliani Communications and Burke Brands? 6 A Yes. 7 Q Do you see that it also 8 includes wire instructions for payment to be 9 made to Giuliani Communications? 10 A Yes. 11 Q Okay. Do you also see up top 12 where it recites, "This agreement is between 13 Rudolph Giuliani, a/k/a Giuliani 14 Communications LLC, and Burke Brands? 15 A Yes. 16 Q What does that a/k/a mean to 17 you? 18 A Also known as. 19 Q Okay. And in your mind was 20 Rudy Giuliani also known as Giuliani 21 Communications, and vice versa? 22 A Well, again, we go back to 23 the insurance thing. He's the key man. 24 Q Okay. 25 Do you see that the address</p>	<p style="text-align: right;">Page 229</p> <p>1 RYAN MEDRANO 2 Q They meaning Burke Brands? 3 A Yes, correct. 4 Q And who did they sign the new 5 contract with? 6 A Standard U.S.A. LLC. 7 Q Is this contract still in 8 effect? 9 A Not this one. This is the 10 old one. The new one is in effect. 11 Q Okay. 12 How do you know that this one 13 is not in effect? 14 A How do I know this one is not 15 in effect? Because they signed a new 16 contract, and it has different wiring 17 instructions, it has a different bank. 18 Q Do you have a copy of the new 19 contract? 20 A I would have to look, yeah. 21 Q Does Giuliani Communications 22 continue to have an interest in the revenues 23 generated for Mr. -- by Mr. Giuliani's work 24 for Burke Brands? 25 A Does Giuliani Communications</p>

<p>1 RYAN MEDRANO 2 have -- I don't believe so. 3 Q Was there ever a document 4 executed to cancel this contract between 5 Giuliani Communications and Burke Brands? 6 A I don't know. I don't know 7 if Maria generated one or not. I think I 8 saw the new contract. 9 Q Okay, let's go to tab 95. We 10 are going to introduce that as Exhibit 16. 11 (The above described document was 12 marked Exhibit 16 for identification as of 13 this date.) 14 A Okay, got it. 15 Q You see this is an e-mail 16 from -- well, this is an e-mail chain from 17 you to Joe Ricci. 18 Joe Ricci wrote you on August 19 1, 2024 and said, "Hi, Ryan, what address 20 are we using for the corporate returns for 21 2023?" 22 Do you remember him asking 23 you that question? 24 A Yes, I do. 25 Q Why do you think he was</p>	<p>Page 230</p> <p>1 RYAN MEDRANO 2 will bother him Saturday, when he gets back, 3 or you tell me if that's a bad idea." 4 Why would it have been a bad 5 idea? 6 A I try not to bother him about 7 this stuff. 8 Q Why would Joe Ricci have had 9 an opinion as to whether it's a bad idea? 10 A We are friends, we talk. 11 When a good time, when is a bad time to 12 approach someone on a question. 13 Q Let's now go to tab 98. This 14 will be Exhibit 16, okay. 15 A Are you sure it's 16 -- 17, 16 I'm sorry. That just popped in. 17 Q Thanks for catching that, 18 yeah, it's Exhibit 17, thanks. 19 (The above described document was 20 marked Exhibit 17 for identification as of 21 this date.) 22 A Yes. 23 Q So this is an e-mail from Joe 24 Ricci sending you the September invoice. 25 And if you look at the attachment, this is</p>
<p>1 RYAN MEDRANO 2 asking you that? 3 A Because he wanted to know 4 which -- where the tax returns should go. 5 It should go to his apartment. 6 Q Is that because the 7 businesses no longer had a physical office? 8 A Correct. 9 Q And the businesses were being 10 run at that point out of his apartment? 11 A Yes. 12 Q And that would have been his 13 New York apartment? 14 A I think it was his Florida 15 apartment, because that's where we 16 changed -- remember we talked about the 17 change of address on the corporate returns 18 in 2023? 19 This is what went to his 20 apartment. 21 Q And here you say, "I have to 22 get RG's address in FL." That's Rudy 23 Giuliani's address in Florida? 24 A Yes. 25 Q And you then continued, "I</p>	<p>Page 231</p> <p>1 RYAN MEDRANO 2 an invoice for \$4,150 -- 3 A Yes. 4 Q -- to Giuliani Partners at 5 the 445 Park Avenue address? 6 A Yes, he just hasn't updated 7 his thing. 8 Q Do you recall whether you 9 gave him an updated address prior to him 10 sending you this e-mail? 11 A I don't know. 12 I mean -- 13 Q So you don't know one way or 14 the other whether you had updated the 15 addresses on Mr. Giuliani's companies at 16 this point? 17 A Right, right. 18 Q What would be the best way to 19 know whether you had or not? 20 A You mean how would I know 21 that Joe didn't change -- 22 Q How would you know at what 23 point you communicated with Joe about the 24 addresses? 25 A Oh, well, I thought in the</p>

<p style="text-align: right;">Page 286</p> <p>1 RYAN MEDRANO 2 I focused on. 3 Q Are you aware of any 4 arrangements whereby Mr. Giuliani would be 5 compensated for a speaking engagement 6 through a payment to Giuliani Defense? 7 A No, I don't see those books, 8 I never got involved with those things, so I 9 don't know. 10 Q How about through a payment 11 to Giuliani Freedom Fund? 12 A No, no. Same thing. 13 Q Sorry, go ahead. 14 A Well, did you understand what 15 I was saying, like at one point I didn't 16 know about them, but on the next statement I 17 made I knew about them, because I read about 18 it. 19 Do you understand that from 20 the last session? 21 Q Yeah, I was just asking 22 whether you recalled ever knowing about a 23 financial arrangement that would involve 24 either Giuliani Defense or the Freedom Fund 25 being paid --</p>	<p style="text-align: right;">Page 288</p> <p>1 RYAN MEDRANO 2 in this case, have you? 3 A I don't believe so, but Joe 4 Ricci might have. I think he turned 5 something over to a Rachel Goodman. Is she 6 at your law firm? 7 Q So, are you aware that you 8 were served with a subpoena to produce 9 documents in this case? 10 A No, I would have sent in 11 whatever. 12 Q Well, let's address that now. 13 So let's take a look at tab 14 D17, which we can publish as Exhibit -- 15 A Are you in a new one? 16 Q My code with tabs is 17 different from your code with the exhibits, 18 so you can stay focused on the exhibit 19 numbers, but that's going to come up as 20 Exhibit 27. 21 A Okay. 22 (The above described document was 23 marked Exhibit 27 for identification as of 24 this date.) 25 Q Let's take a look at that</p>
<p style="text-align: right;">Page 287</p> <p>1 RYAN MEDRANO 2 A No. 3 Q -- for Mr. Giuliani's 4 services -- 5 A No. 6 Q -- at speaking engagements or 7 otherwise? 8 A No, not -- 9 Q Do you recall any 10 arrangements where Mr. Giuliani would 11 perform services and then payment would be 12 sent somewhere other than to Mr. Giuliani, 13 Giuliani Communications or Standard U.S.A., 14 just in the last three years? 15 A In the last three years? For 16 Washington Speakers Bureau. 17 Q How about any other services? 18 A I would have to look at the 19 records. I don't know. 20 Q So we have talked a lot today 21 about records that you would have to look at 22 in order to be able to fully answer the 23 questions I've been asking. 24 You haven't produced any 25 records or other documents to the Plaintiffs</p>	<p style="text-align: right;">Page 289</p> <p>1 RYAN MEDRANO 2 together. 3 A Okay, I've got it. 4 Where do you want me to go? 5 Q Well, you can see that this, 6 from the docket stamp up top, this is a 7 filing on the docket in the Southern 8 District of New York. 9 If you go to page 2, you will 10 see that this is an e-mail from Annie 11 Houghton-Larsen to you at your Giuliani 12 Partners e-mail address. 13 A Okay. 14 Q It lists two attachments, but 15 the content of the e-mail informs you that 16 the court entered an order permitting 17 Plaintiffs to serve you by alternative 18 methods, that that order is attached, and 19 also a Rule 45 subpoena for documents that's 20 returnable on December 18th. 21 A Oh, shit, sorry. 22 Q You agree that that's what 23 this e-mail says? 24 A Yes, it says right there, I'm 25 looking at it.</p>

<p style="text-align: right;">Page 290</p> <p>1 RYAN MEDRANO 2 Q So let's now take a look at 3 tab D18, and we can mark that as Exhibit 28. 4 (The above described document was 5 marked Exhibit 28 for identification as of 6 this date.) 7 A Okay. 8 Q Now, Exhibit 28 is another 9 document that's been filed on the docket in 10 the Southern District of New York. 11 And if you flip to the second 12 page, do you see that this is a subpoena 13 issued in the Freeman versus Giuliani 14 matter? 15 A Yes. 16 Q And you see that it's issued 17 to you? 18 A Yes, I see Ryan Medrano, 1 19 Irving Plaza. I didn't see this until now. 20 Q This is the first time you're 21 seeing this document? 22 A Yes, yes. 23 Q And you see that it's dated 24 December 4, 2024? 25 A Yes.</p>	<p style="text-align: right;">Page 292</p> <p>1 RYAN MEDRANO 2 trip, but -- when is this due? I know it's 3 past due, but when can I -- when is the next 4 time I can have it due, like a week from now 5 or something like that? 6 Q Yeah, are you willing to 7 search and then -- search for and then 8 produce documents responsive to this 9 subpoena within seven days of today? 10 A I didn't look at what they 11 are all asking for, but ideally, yes. But I 12 didn't read through what they could be 13 asking for, the moon, and I would be in 14 trouble. 15 Can I get back to you? 16 Q Can you assure me now that 17 you will make every effort to search for and 18 produce every document in your possession or 19 control that's responsive to this subpoena 20 within seven days, which is by January 6, 21 2024? 22 And then, if that's not 23 possible for some reason, that you will let 24 us know promptly? 25 A Yes. Who do you want me to</p>
<p style="text-align: right;">Page 291</p> <p>1 RYAN MEDRANO 2 Q Okay. And the production 3 deadline that's given is December 18, 2024? 4 A Right. 5 Q Okay. So since you haven't 6 seen this document until just now, am I 7 right that you have not taken any steps to 8 comply with this subpoena? 9 A No, I have not. 10 I just -- the attorney said I 11 didn't -- I wasn't involved in this, so -- 12 Q Okay. 13 A I'm sorry. 14 Q Did you take any steps to 15 search for documents that would be 16 responsive to this subpoena? 17 A No, but if I have to, I have 18 to. So, I'm sorry, I didn't -- I am seeing 19 it right now. 20 Q Okay, do you intend to comply 21 with this subpoena? 22 A Yeah. 23 Q When do you intend to comply 24 with it? 25 A I was planning on taking a</p>	<p style="text-align: right;">Page 293</p> <p>1 RYAN MEDRANO 2 contact in your office? 3 Q You can e-mail me directly. 4 My e-mail address is anathan@Wilkie.com. 5 And going forward, is the 6 best way to reach you personally through 7 your Gmail address? 8 A Yes. 9 A Or through your Giuliani -- 10 A Yes, that I check, 11 Medranoryan I check. 12 Q Medranory@gmail.com? 13 A Yes. 14 Q The court has authorized 15 e-mail service on you at the Giuliani 16 Partners e-mail address. 17 In addition to that, we will, 18 going forward, we will include the Gmail 19 address, even though under the court's 20 order, service on the Giuliani Partners 21 address would be sufficient. 22 A Okay. 23 Q So, just to confirm our 24 understanding, by January 6, 2024 we will 25 expect a complete production of documents</p>

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<p style="text-align: right;">Page 294</p> <p>1 RYAN MEDRANO 2 from you that's responsive documents to that 3 subpoena. 4 If you're unable to meet that 5 deadline, could you please let us know by 6 January -- 7 A You will know by Friday, 8 because I will have a good grasp of what I 9 have to get to you, so. 10 Q Okay. So by Friday, January 11 3rd, you will let us know if it's not 12 possible to meet our deadline of January 13 6th? 14 A Yes. 15 Q Thank you, Mr. Medrano. 16 Because we haven't received 17 documents from you, I'm going to hold this 18 deposition open, and we may need to return 19 to this deposition once we have reviewed 20 those documents or seek further relief from 21 the court to schedule another deposition 22 with you if that's necessary. 23 Before I wrap up, I would 24 just like to ask you are there any of your 25 answers today that you would like to change</p>	<p style="text-align: right;">Page 296</p> <p>1 RYAN MEDRANO 2 will be in touch if that changes. 3 A Yes, so I can just go off 4 this, the document you just posted? Just 5 use that? 6 Q If you would like, we will 7 send, as a courtesy, another copy of it. It 8 will be the same document that you've just 9 reviewed. 10 A I can just print this one 11 out, though. 12 Q You're welcome to do that, 13 and we will follow up and confirm by e-mail. 14 A Okay. 15 Q Thank you, Mr. Medrano, for 16 your time. 17 A Have a good day. 18 THE VIDEOGRAPHER: We are off 19 the record at 3:24 p.m., and this 20 concludes today's testimony given by 21 Ryan Medrano. 22 The total number of media 23 used was 5 and will be retained by 24 Veritext. 25</p>
<p style="text-align: right;">Page 295</p> <p>1 RYAN MEDRANO 2 or modify? 3 Has your recollection 4 changed? Has everything you have told me -- 5 is everything you have told me still your 6 best testimony? 7 So I will take those in 8 order. 9 Is there anything about the 10 answers you have given to me today that you 11 would like to change? 12 A Not that I can recall, but I 13 haven't really thought too deeply. If I do, 14 then I will call you. 15 Q And sitting here today, your 16 testimony has been your best testimony 17 you've been able to give? 18 A Yes. 19 Q All right. Well, I will hold 20 the deposition open for the reasons stated, 21 and if we need to revisit anything we have 22 discussed after receiving your documents, we 23 will do so. 24 Otherwise, I don't have any 25 further questions for you right now, and we</p>	<p style="text-align: right;">Page 297</p> <p>1 RYAN MEDRANO 2 3 I, the undersigned, a 4 Certified Shorthand Reporter of the 5 State of New York, do hereby certify: 6 That the foregoing proceedings were taken before me at 7 the time and place herein set forth; 8 that any witnesses in the foregoing proceedings, prior to testifying, 9 were duly sworn; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; 10 That the foregoing transcript is a true record of the testimony given. 11 Further, that if the foregoing pertains to the original transcript of a deposition in a federal case before completion of the proceedings, review of the transcript [] was [x] was not requested. 12 I further certify I am neither financially interested in the action nor a relative or employee of any attorney or party to this action. 13 IN WITNESS WHEREOF, I have 14 this date subscribed my name. 15 16  17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Stephen J. Moore RPR, CRR</p>

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